



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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FEB - 3 2014

Ref: 8EPR-N

Diana McGinn, Team Leader
San Luis Valley Public Lands Center
Rio Grande National Forest
1083 W. Hwy 160
Monte Vista, CO 81144

RE: EPA Comments for the Cumbres Vegetation
Management Project Draft Environmental
Impact Statement, CEQ # 20130372

Dear Ms. McGinn:

In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act (CAA), the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Draft Environmental Impact Statement (EIS) for the Cumbres Vegetation Management Project. As provided in more detail at the end of the letter, our review has resulted in a rating of "Lack of Objections" (LO).

The Draft EIS was prepared by the Conejos Peak Ranger District of the U.S. Department of Agriculture Forest Service (USFS) Rio Grande National Forest to analyze potential environmental impacts associated with salvaging timber stands being killed by spruce beetle and the need for long-term regeneration of the future forest, implementing fuel reduction treatments adjacent to private lands, and managing hazard trees that may impact infrastructure in the project area. The project area is located in Conejos County approximately 23 miles west of the town of Antonito, Colorado, and includes approximately 3,541 acres. Private land is located on the northeast and southwest edges. A summary of the three alternatives analyzed in the Draft EIS is as follows:

Alternative 1 (No Action) - no vegetation or fuels management actions.

Alternative 2 (Preferred Alternative) - salvage harvesting on up to 2,498 acres of beetle infested spruce stands; plant approximately 650 acres; construct or reuse 8.3 miles of temporary road; maintenance and reconstruction of 5.8 miles of decommissioned NFS roads; maintenance and use of 17.5 miles NFS existing roads; and winter burning of slash piles created during the project. It is estimated that 22 acres of landings would be needed across the project area.

Alternative 3 - salvage harvesting on up to 1,549 acres of beetle infested spruce stands; plant approximately 170 acres; construct or reuse approximately 4.4 miles of temporary road; maintenance and reconstruction of 0.6 miles of decommissioned NFS roads; maintenance and use of 15.8 miles NFS; and winter burning of slash piles created during the project. It is estimated that 15 acres of landings would be needed across the project area.

The EPA understands the need to address the tree mortality, forest health, fuels and fire risk, and timber salvage issues in the project area. We consider protection of aquatic resources to be among the most critical issues to be addressed in any NEPA analysis for vegetation management activities. The Draft EIS states that reopening of the decommissioned road that parallels the Rio de los Pinos is likely to negatively impact the stream. It further notes that the road was previously closed due to the impact it had on the stream. We support the USFS plans to carefully design the road reopening and monitoring to ensure the impact to the stream habitat is minimized. We suggest the Final EIS provide further information on how the road and monitoring will be designed to accomplish this objective. We recommend the stream/road area is highlighted in Figure 2-2, or additional detail on the location of this road and stream is provided in the text. Further, we recommend that the USFS consider whether another alternative that excludes this area from the proposed project would effectively meet the project purpose and need.


The burning of slash piles in winter is part of the project and described in Section 3.11. As noted on page 93, this burning will occur under a Colorado Air Pollution Control Division permit. The same page references "prescribed burns." Since prescribed burns can be an independent vegetation treatment, we suggest that the text clarify that the term prescribed burns for this project references the burning of the slash piles.

EPA's Rating and Recommendations

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures used to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, the EPA is rating this Draft EIS as "Lack of Objections" (LO). The "LO" rating indicates that the EPA review has not identified environmental impacts requiring substantive changes to the preferred alternative. A description of EPA's rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

We appreciate your consideration of our suggestions. These comments are intended to help ensure a comprehensive assessment of the project's environmental impacts, adequate public disclosure, and an informed decision-making process. If further explanation is desired, please contact me at 303-312-6704, or Lisa Lloyd of my staff, at 303-312-6537.

Sincerely,

for 

Philip S. Strobel
Acting Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

cc: Andrea Jones, District Ranger